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**VIA ELECTRONIC CASE FILING SYSTEM**

Hon. P. Kevin Castel  
U.S. District Judge  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Echo Bay Pharmaceuticals, LLC v. Torrent Pharma, Inc., 20-cv-6345 (PKC)

Dear Judge Castel,

I write on behalf of Defendant Torrent Pharma Inc. to respectfully move to file under seal an unredacted copy of Torrent's Pre-Motion Letter seeking leave to file a Rule 12(b)(6) motion to dismiss and a motion to stay discovery (the "Pre-Motion Letter"). The next conference before the Court is an Initial Pretrial Conference, set for October 14, 2020 at 12:00 p.m.

Plaintiff Echo Bay Pharmaceuticals, LLC moved the Court to seal Exhibits A and B to the Complaint. ECF 7. Torrent does not oppose Echo Bay's motion. ECF 21.

Torrent quotes from Exhibit A and discusses the contents of Exhibits A and B in the Pre-Motion Letter. Because Echo Bay's motion to seal remains pending, Torrent has redacted these quotations and discussion from its Pre-Motion Letter. Torrent respectfully requests that the unredacted copy of its Pre-Motion Letter be filed under seal.

Respectfully submitted,

*s/ Ben D. Kappelman*

Ben D. Kappelman  
Counsel for Defendant Torrent Pharma Inc.

cc: All counsel of record via ECF